

Chief Judge Coughenour

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JUN 12 2003

AT SEATTLE
CLERK U.S. DISTRICT COURT
BY WESTERN DISTRICT OF WASHINGTON DEPUTY

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff,

v.

HUSSEIN ALSHAFEI,

Defendant.

NO. CR02-421C

SUPERSEDING INFORMATION

(REDACTED PURSUANT TO THE
COURT'S GENERAL ORDER
DATED MAY 29, 2003)

The United States Attorney charges that:

COUNT ONE

(Conspiracy to Launder Monetary Instruments)

Beginning at a time unknown but around 1996 and continuing through on or about December 2002, within the Western District of Washington and elsewhere, HUSSEIN ALSHAFEI and Abu Haider, named herein as a coconspirator but not as a defendant, knowingly and intentionally did conspire to engage in monetary transactions in criminally derived property of a value greater than \$10,000 which property was derived from specified unlawful activity, that is, violations and attempted violations of the International Emergency Economic Powers Act (IEEPA) and the regulations promulgated thereunder by providing an economic resource to a person or persons in Iraq.

1 The United States Attorney further charges that these monetary transactions took
2 place, in part, in the United States and, to the extent the transactions took place outside
3 the United States, defendant HUSSEIN ALSHAFEI was a United States person as
4 defined in Section 3077, Title 18, United States Code.

5 All in violation of Title 18, United States Code, Sections 1956(h) and 1957.

6
7 **CRIMINAL FORFEITURE ALLEGATIONS**

8 Pursuant to Title 18, United States Code, Section 982(a)(1), the defendant shall
9 forfeit to the United States the following property:

10 a. All right, title, and interest in any and all property involved in the offense
11 in violation of Title 18, United States Code, Section 1956(h), and all
12 property traceable to such property, including the following:

13 1. **BANK ACCOUNTS**

- 14 a. all funds in Comerica Bank account # [REDACTED] 5890, under the
15 name ALSHAFEI FAMILY CONNECT, INC.;
16 b. all funds in Homestreet Bank account # [REDACTED] 3665, in the
17 name ALSHAFEI FAMILY CONNECT, INC; and,
18

19 If any of the above-described forfeitable property, as a result of any act or
20 omission of the defendant:

- 21 (a) cannot be located upon the exercise of due diligence;
22 (b) has been transferred or sold to, or deposited with, a third party;
23 (c) has been placed beyond the jurisdiction of the court;
24 (d) has been substantially diminished in value; or
25 (e) has been commingled with other property which cannot be divided without
26 difficulty;
27
28

1 it is the intent of the United States, pursuant to 21 U.S.C. § 853(p) as incorporated by
2 18 U.S.C. § 982(b), to seek forfeiture of any other property of said defendant up to the
3 value of the forfeitable property described above.

4
5 DATED this _____ day of June, 2003.

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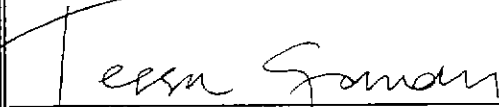
8 JOHN MCKAY
9 United States Attorney

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12 FLOYD SHORT
13 Assistant United States Attorney

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16 FRANCIS J. DISKIN
17 Assistant United States Attorney

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19 

20 TESSA M. GORMAN
21 Assistant United States Attorney